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NHTSA-2008-0019

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Administrator
National Highway Traffic Safety Administration
U.S. Department of Transportation
1200 New Jersey Avenue, SE., West Building, Ground Floor, Docket Room W12-140
Washington, DC 20590

15 January, 2008

Re: Docket No. NHTSA-2007-28322 FMVSS108 Re-write: Request for Reconsideration

Dear Sir:

Koito Manufacturing Co., Ltd., located at 500 Shimizu-kitawaki, Shizuoka-shi 424-8764 Japan, is a designer and manufacturer of exterior automotive lighting products for Japan, U.S. and world market. We hereby submit our request for reconsideration on the subject amendment of the standard published on December 4, 2007.

We hope these are sufficiently explained, but of course if you find any of them needs further clarification, please let us know.

Sincerely,

Takeshi Izawa
Deputy General Manager, Technical Administration
KOITO MANUFACTURING CO., LTD.

Attachment

* We don't attach the support documentation to this letter in order to easily transmit by FAX.
We send same letter enclosed it to you by airmail on 15 January. It will reach you by this weekend.

1. S10.18.9.1.5 Measuring the cutoff parameter.

S10.18.9.1.5.1 should be amended as follows;

The headlamp is mounted on a headlamp fixture which simulates its actual design location on any vehicle for which the headlamp is intended. The fixture, with the headlamp installed, is attached to the goniometer table in such a way that the fixture alignment axes are coincident with the goniometer axes. The headlamp is energized at the specified test voltage. The cutoff parameter must be measured at a distance of 10m. from a photosensor with **approximately** 10mm. diameter**, or 18.3m or more from a photosensor with approximately 30mm. diameter.**

< Justification >

The negotiated rulemaking act for the establishment of visual optical aiming requirement of FMVSS108 was worked out over ten years ago, and GTB now acknowledges the 25m (with 30mm aperture size) alternative as an effective cut-off measuring distance as explained in ECE/TRANS/WP.29/2007/77 (see enclosure). The inclusion of 25m alternative was encouraged mainly from the contestation that measurement of cut-off should be conducted at the same distance where the photometric measurements are done.

In this meaning, Koito Manufacturing hereby ask you that a distance 18.3m or more should be accepted as an alternative for the measurement of cut-off. Cut-off can be accurately evaluated at both distances, and in case there is any causation that evaluation at 10m provides more safety, we would ask it be placed in the docket for examination and discussion.

Just for your information, ECE/TRANS/WP.29/2007/77 was already approved by GRE and WP.29, and shortly becomes operational as an effective method of cut-off measuring method under ECE Regulation.

2. Editorial corrections:

S6.1.3. Mounting location. **S6.1.3.1.** Each lamp, reflective device and item of associated equipment must be securely mounted on a rigid part of the vehicle, other than glazing, that is not designed to be removed except for repair, within the mounting location and height limits as specified in Table I, and in a location where it complies with all applicable photometric requirements, effective projected luminous lens area requirements, and visibility requirements with all obstructions considered. **S6.1.3.2.** When multiple lamp arrangements or multiple compartment rear turn signal lamps, stop lamps, or taillamps are used, with only a portion of the compartments or lamps installed on a ~~**rigid part of the vehicle**~~ **fixed body panel** of the vehicle, that portion must meet at least the photometric requirements for the applicable single compartment lamp.	**< Comment >** Installation of a lighting equipment on "rigid part of the vehicle" is allowed by current FMVSS108 S5.3 and this was correctly reworded into the new S6.1.3.1. On the other hand, the expression "rigid part of the vehicle" in the new S6.1.3.2. should be replaced by the word "fixed body panel" so that it reflects the intent of July 2000 interpretation to Mr. King which is to say; body-mounted lamps (rear turn signal, stop lamp, or tail lamp) are the ones that must be designed to comply with FMVSS108.
S7.3.12 Ratio to taillamps. **S7.3.12.1** When a taillamp **on a multipurpose passenger vehicle, truck, trailer, or bus of 2032mm or more in overall width,** is combined with a stop lamp, the luminous intensity of the stop lamp at each identified test point must not be less than the luminous intensity of the taillamp at the same test point times the multiplier shown for that test point in Table IX. **S7.3.12.2** ..... **S7.3.12.3** **S7.3.12.4**	**< Comment >** Need to clarify that SAE J1398 MAY85 does not have the 560mm / 410mm classification, and always apply the ratio requirement.
S10.13.4.1, S10.14.7.1 and S10.15.7.1; Physical tests for each type of headlighting systems. Each headlamp must be designed to conform to the ... ~~**inward force test**~~ ...	**< Comment >** In the preamble, it was explained that the inward force test is required for all the types of headlamps. This is inconsistent with Federal Register published on May 9, 1989 (Docket No.85-15; Notice 8) which clearly explains that the test is only applicable to the headlamps that is capable of being mechanically aimed by externally applied aiming devices.

S10.15 Replaceable bulb headlighting systems. All replaceable bulb headlighting systems must be of a type designed in Table II-d. **S10.15.1. Installation.** A replaceable bulb headlighting system must consist of either two lamps, **each containing either one or two replaceable light sources,** or four lamps, **each containing a single replaceable light source** as specified for the applicable system in Table II-d. A system must provide in total not more than two upper beams and two lower beams and must incorporate not more than two replaceable light source in each headlamp.	**< Comment >** The proposed text allows "two replaceable light sources in each headlamp"; i.e. "two replaceable light sources in each headlamp of a four-headlamp-system" (2 bulbs X 4 lamps). This is not the intention of the original requirement.
S10.15.5. Additional light sources. A replaceable bulb headlamp may incorporate ~~**replaceable**~~ light sources that are used for purposes other than headlighting.	**< Comment >** The requirement should be identical to the expression of S10.14.5, otherwise the current text implies that light sources incorporated in the replaceable-bulb-headlamp-assembly and used for other purposes than headlighting must be always "replaceable".
Table I-a. Required lamps and reflective devices - High mounted stop lamp - Activation Steady burning. Must only be activated upon application of the service brakes or **may be activated** by a device designed to retard the motion of the vehicle.	**< Comment >** This correction is necessary since the activation of a high mounted stop lamp is optional on the activation of a device designed to retard the motion of the vehicle.

3. Request for clarification of the requirement:

S14.4.2.1.3 requires that plastic optical materials shall be tested in thicknesses of 1.6±0.25mm, 2.3±0.25mm, 3.2±0.25mm and 6.4±0.25mm, and it was explained (in the preamble) that compliance testing would be conducted in those four thicknesses. After completion of the outdoor exposure test, they are to be evaluated for the existence of haze (and other physical deterioration), variation of luminance transmittance, and color specifications. However, unlike other things, only the requirement of color (S14.4.2.2.4.5.) states that all materials must conform to the test " in the range of thickness stated by the material manufacturer". The expression, "in the thickness range stated by the manufacturer" originally existed in SAE J576 in a sentence where material thickness is determined. However, S14.4.2.1.3 of the final rule intentionally omits the expression. Does this mean, for example, a material thickness over 7mm can be authorized if it was once tested under S14.4.2 in those four thicknesses and found satisfactory?
We would like your clarification of the requirement.